


GRANTED.

SO ORDERED.

Hon. Paul A. Engelmayer
United States District Court
for the Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007



PAUL A. ENGELMAYER
United States District Judge

Dated: June 27, 2024
New York, New York

June 26, 2024

**Re: Jane Street Group, LLC v. Millennium Management LLC, Douglas Schadewald,
and Daniel Spottiswood, No. 1:24-cv-02783**

Dear Judge Engelmayer:

We write on behalf of Defendants Douglas Schadewald (“Schadewald”), Daniel Spottiswood (“Spottiswood,” and together with Schadewald, “Individual Defendants”) and Millennium (together with Individual Defendants, “Defendants”). Pursuant to Local Civil Rule 7.1(d) and Individual Practice Rule 4.B, we seek permission to file under seal Defendants’ Memorandum of Law in Opposition to Plaintiff’s Motion to Strike Certain of Defendants’ Amended Affirmative Defenses (the “Opposition to Motion to Strike”).

Defendants believe that the Opposition to Motion to Strike should be made public in its entirety as it does not contain any information that would constitute a “trade secret or other highly confidential business information” sufficient to outweigh the presumption of public access. *See TileBar v. Glazzio Tiles*, 2024 WL 1186567, at *27 (E.D.N.Y. Mar. 15, 2024). Nevertheless, in light of Plaintiff’s pending motions for leave to seal portions of the Amended Complaint (Dkt. 62), and to seal portions of Millennium’s Counterclaims and Amended Answer (Dkt. 114) which contains certain of the affirmative defenses at issue, the Defendants believe that Plaintiff may seek to seal portions of the Opposition to Motion to Strike. Accordingly, Defendants seek leave to provisionally file their Opposition to Motion to Strike under seal. Defendants will meet and confer with Plaintiff regarding any redactions Plaintiff believes are necessary and warranted by law, and file a public version of the Amended Affirmative Defenses by close of business on Friday, June 28, 2024. Defendants reserve the right to challenge any redactions proposed by Plaintiff.

Respectfully submitted,

/s/ Brian R. Campbell
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